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F. # 2019R01298

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ OCT 24 2019 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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BROOKLYN OFFICE

UNITED STATES OF AMERICA

- against -

QUINCY THORPE and  
EMMANUEL ASUQUO OKON,

Defendants.  
----- X

THE GRAND JURY CHARGES:

INDICTMENT

**CR 19 - 492**

Cr. No.  
(T. 18, U.S.C., §§ 371, 659,  
981(a)(1)(C), 2 and 3551 et seq.; T. 21,  
U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

**BRODIE, J.**

**LEVY, M.J.**

COUNT ONE

(Conspiracy to Steal Cargo)

1. On or about September 24, 2019, within the Eastern District of New York, the defendants QUINCY THORPE and EMMANUEL ASUQUO OKON, together with others, did knowingly and willfully conspire to steal, unlawfully take and carry away from an air terminal, airport, aircraft terminal and air navigation facility, to wit: John F. Kennedy International Airport in Queens, New York ("JFK Airport"), goods and chattels of a value of \$1,000 or more, to wit: a bag containing United States and foreign currency of approximately \$258,205 in value, which were moving as, were part of and which constituted an interstate shipment of freight, express and other property, with intent to convert said goods and chattels to their own use, contrary to Title 18, United States Code, Section 659.

2. In furtherance of the conspiracy and to effect its objects, the defendants QUINCY THORPE and EMMANUEL ASUQUO OKON, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about September 24, 2019, at JFK Airport, THORPE stole a bag containing cash from a shipment destined for Miami, Florida.

(b) On or about September 24, 2019, at JFK Airport, THORPE concealed the stolen bag and its contents in a luggage trailer attached to a vehicle.

(c) On or about September 24, 2019, at JFK Airport, THORPE brought the stolen bag and its contents into a car that OKON drove.

(d) On or about September 24, 2019, at JFK Airport, OKON drove the car containing the stolen bag and its contents away from JFK Airport.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO  
(Stolen Cargo)

3. On or about September 24, 2019, within the Eastern District of New York, the defendants QUINCY THORPE and EMMANUEL ASUQUO OKON, together with others, did knowingly and intentionally steal, unlawfully take and carry away from an air terminal, airport, aircraft terminal and air navigation facility, to wit: JFK Airport, goods and chattels of a value of \$1,000 or more, to wit: a stolen bag containing United States and foreign currency of approximately \$258,205 in value, which were moving as, were part of

and which constituted an interstate shipment of freight, express and other property, with intent to convert said goods and chattels to their own use.

(Title 18, United States Code, Sections 659, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendants that, upon their conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

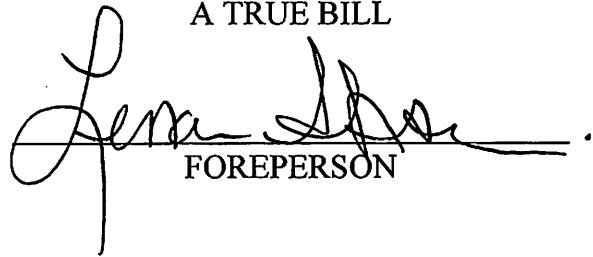
divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

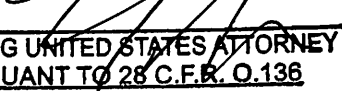
A TRUE BILL



FOREPERSON

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RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. O.136

F.#: 2019R01298  
FORM DBD-34  
JUN. 85

No.

**UNITED STATES DISTRICT COURT**  
*EASTERN District of NEW YORK*  
**CRIMINAL DIVISION**

**THE UNITED STATES OF AMERICA**

vs.

**QUINCY THORPE AND EMMANUEL ASUQUO OKON,**

**Defendants.**

**INDICTMENT**

(T. 18, U.S.C., §§ 371, 659, 981(a)(1)(C), 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

*A true bill.*

*Foreperson*

*Filed in open court this \_\_\_\_\_ day,*

*of \_\_\_\_\_ A.D. 20 \_\_\_\_\_*

*Clerk*

*Bail, \$ \_\_\_\_\_*

*John Vagelatos, Assistant U.S. Attorney (718) 254-6182*